

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re:

MATTHEW JOHNSON, JR.

LAKEISHA S. RIVERS

Case No. 20-11941 (MDC)

Chapter 13

OBJECTION TO CONFIRMATION

Santander Consumer USA Inc. dba Chrysler Capital as servicer for CCAP Auto Lease (“Santander”), a secured creditor of the Debtors, objects to the Debtors’ plan for the following reasons:

A. The Debtor fails to assume the lease for the **2017 Dodge Durango** in the plan. If the Debtor intends to retain the vehicle, the plan must call for the assumption of the lease. Presently the lease is rejected in the plan. If the lease is not assumed, at confirmation, the stay will lift automatically in accordance with §365(p)(3).

/s/ William E. Craig

William E. Craig, attorney for
Santander Consumer USA Inc. dba Chrysler
Capital as servicer for CCAP Auto Lease

Dated: 5/12/20